

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

HOBART CORPORATION,)	
KELSEY-HAYES COMPANY, and)	No. 3:13-cv-115
NCR CORPORATION,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
THE DAYTON POWER AND LIGHT)	
COMPANY, et al.,)	
)	
Defendants.)	

Pursuant to the Omnibus Scheduling Order dated April 11, 2016, which states that “All lay witnesses not previously disclosed in initial disclosures or discovery to be disclosed by: November 1, 2016,” Plaintiffs disclose the following lay witnesses. The subject Defendant is included below where applicable.

PLAINTIFFS’ LAY WITNESSES

1. Jack Akers
Harris Corporation, *as successor to* Harris-Seybold Co.
2. Robert Aldredge
7064 Salem Crossing Place
Englewood, Ohio 45322
(937) 832-0599
See deposition.
3. Kenneth Anderson
ConAgra Grocery Products Co., LLC, *as successor to* McCall Corp.
4. Scott Arentsen
The Dayton Power and Light Company.
5. Tim Bailey

The Sherwin-Williams Company.

6. Jerry Baker
See deposition.
7. John Baker
The Dayton Power and Light Company.
8. Thomas Beal
57 Tranquil Trail
Dayton, Ohio 45459
(937) 435-6522
See deposition.
9. B.D. Beatty
3407 Oakmont Avenue
Dayton, OH 45429
Coca-Cola Refreshments USA, Inc., *as successor to* Dayton Coca-Cola Bottling Co.
10. George Beemsterboer
Monsanto Company, *a/k/a* Monsanto Research Company, *n/k/a* Pharmacia Corporation.
11. Estle Bernard
1211 Mals Way
Miamisburg, OH 45342
Harris Corporation, *as successor to* Harris-Seybold Co.
12. William Bines
Former Sanitarian, Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of the Site in the late 1960s through the 1970s, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site during that time period.
13. Robert Bleazard, PE
Senior HS&E Manager – Environmental Remediation
ZF TRW Automotive Inc.
11202 E. Germann Road
Mesa, Arizona 85212
Current employee; please contact through Plaintiffs' counsel.
Kelsey-Hayes Company.

14. Horace Boesch Jr.
2440 Rugby Road
Dayton, Ohio 45406
See depositions.
15. John Boltz
Harris Corporation, *as successor to* Harris-Seybold Co.
16. Boss Bowlin
444 West Lomar Avenue
Carlisle, OH 45005
937-746-7731
Kimberly-Clark Corporation.
17. Mark Bowling
Waste Management of Ohio, Inc., as successor to Industrial Waste Disposal Co. Inc., and to Blaylock Trucking and Waste Removal, and to SCA Services of Ohio, Inc., and to Container Services, Inc. a/k/a Container Service, Inc., and to General Refuse Service, Inc., and to Container Service Co., and to General Sanitation Corporation.
18. Chris Bridges
The Peerless Transportation Company.
19. Ken Brown, CHMM
Manager of Environmental and Chemical Compliance
Illinois Tool Works Inc.
155 Harlem Avenue
Glenview, IL 60025
Current employee; please contact through Plaintiffs' counsel.
Hobart Corporation.
20. Tracy Buchanan
Former employee of the Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of the Site during the 1980s and 1990s, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site during that time period.
21. William Burrell Sr.
Harris Corporation, *as successor to* Harris-Seybold Co.
22. Earl Campbell
Harris Corporation, *as successor to* Harris-Seybold Co.

23. James Campbell
Engineering Management, Inc.
1500 Ardmore Boulevard, Suite 502
Pittsburgh, PA 15221
412-244-0917
Overall dollars spent; PRP search costs.
24. Joe Caperna
2860 Maginn Drive
Beavercreek, OH 45434
937-429-1512
Cox Media Group Ohio, Inc., as successor to Dayton Daily News
and to Dayton Journal Herald.
25. Ellis Carver
2614 Kennedy Avenue
Dayton, OH 45420
937-298-6207
Coca-Cola Refreshments USA, Inc., *as successor to* Dayton Coca-Cola Bottling Co.
26. Anthony B. Cibulka
Flowserve Corporation as successor to Duriron Corporation.
27. Karen Cibulskis
US EPA, Region 5.
77 West Jackson Blvd
Chicago, IL 60604
312-886-1843
Consistency with NCP; cooperation by the parties with Federal,
State, or local officials to prevent any harm to the public health or
the environment; connection of releases to response costs.
28. Dan Crago
Valley Asphalt Corporation.
29. Timothy Crotty
Van Dyne-Crotty Co., *as successor to* Van Dyne-Crotty, Inc.
30. Thomas Ctvrtnicek
See deposition.
31. John W. Davis
117 Westboro Street
Dayton, Ohio 45417

(937) 228-0365

See deposition.

32. Jake Derksen
6864 Colbaugh Road
Bethel Township, OH
937-845-1378
Coca-Cola Refreshments USA, Inc., *as successor to* Dayton Coca-Cola Bottling Co.
33. William R. Dybvad
7411 Brandtvista Avenue
Dayton, OH 45424
(937) 236-2284
See deposition.
34. Ken Eakins
Harris Corporation, *as successor to* Harris-Seybold Co.
35. Greg Edsall
203 E. Elmwood Drive
Dayton, OH 45459
937-672-4420
The Sherwin-Williams Company.
36. Gary Elam
City of Dayton, Ohio.
37. John Eichstadt
Harris Corporation, *as successor to* Harris-Seybold Co.
38. Richard L. Fahrenholz
367 Tampico Drive
Palmetto, FL 34221
(941) 721-9874
See deposition.
39. Charles L. Fields
1033 Cumberland Avenue
Dayton, Ohio 45406
See deposition.
40. William Fleckenstein
194 N. Bickett Road
Xenia, Ohio 45385
(937) 352-6334

See deposition.

41. Richard Foley
Harris Corporation, *as successor to* Harris-Seybold Co.
42. Xonerale Freeman
See deposition.
43. Fred Gentry
Kimberly-Clark Corporation.
44. William Gilman
644 Peach Orchard Drive
West Carrollton, OH 45449
937-859-8727
Kimberly-Clark Corporation.
45. Russell Gilmore III
830 Cottonwood Drive
Tipp City, OH 45371
(937) 667-3822
The Peerless Transportation Co.
May have knowledge of operations, customers, transporters to the Site, and hazardous substances disposed of at the Site.
46. D. Gerald Glasgow
988 Congress Park Drive
Dayton, OH 45135
937 433-1702
Former employee of Monsanto Company; may have knowledge of the historic activities of Defendant which have resulted in the discharge, release, or disposal, of hazardous substances, contaminates, or pollutants at or adjacent to the Site.
47. Tom Glass
Former Sanitarian, Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of the Site, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site.
48. Art Gray
Dayton Industrial Drum, Inc.
49. Randall Griffin
The Dayton Power and Light Company.

50. David Grillot
2250 Bonnie Birch Court
Dayton, Ohio 45459
937-620-4866
See deposition.
51. Edward Grillot
See depositions.
52. Clarence Hamm
Kimberly-Clark Corporation.
53. Willie Hardy
807 Plover Lane
Clayton, Ohio 45315
(937) 836-2771
See deposition.
54. Richard Hart
160 Marchester Drive
Dayton, Ohio 45429
(937) 298-4080
See deposition.
55. Richard Hartle
See deposition.
56. Julian Hayward
GHD
651 Colby Drive
Waterloo, Ontario N2V 1C2
519-884-0510
Work performed in VI and RI/FS; consistency with NCP; releases at Site; connection between releases and incurrence of response costs.
57. Bryan Heath
NCR Corporation.
3097 Satellite Blvd, Building 700
Duluth, GA 30097
Current employee; please contact through Plaintiffs' counsel.
NCR Corporation.
58. Luther Henry
618 Eleanor Avenue

Dayton, Ohio 45417
(937) 263-1088
See deposition.

59. Gary Herman
Harris Corporation, *as successor to* Harris-Seybold Co.
60. Ralph High
Harris Corporation, *as successor to* Harris-Seybold Co.
61. Robert Hipp
937-433-1236
The Dayton Power and Light Company.
62. William Hopkins
Harris Corporation, *as successor to* Harris-Seybold Co.
63. David Hussong
1880 Radio Road
Dayton, OH 45431
See deposition.
64. Thomas Hut
Former Sanitarian, Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of
the Site during the 1980s and 1990s, operations, types of waste
disposed of, identity of generators and transporters of waste to the
Site, and methods of disposal at the Site during that time period.
65. Victor Infanto
333 Franklin Street
Centerville, OH 45449
937-219-3832
DAP Products Inc. *as successor to* DAP, Inc.; La Mirada Products
Co., Inc., *formerly known as* DAP, Inc.
66. Edward Jenkins
2017 Aurora Avenue
Lewis Center, Ohio 43035
(740) 879-4453
See deposition.
67. Ken Jewell
The Dayton Power and Light Company.

68. Marshall Jones
Dayton Industrial Drum, Inc.
69. Henry Jordan
6200 Germantown Pike
Dayton, Ohio 45439
(937) 859-1816
See deposition.
70. Jim Jurgensen
Valley Asphalt Corporation.
71. Jim Jurgensen II
Valley Asphalt Corporation.
72. Gary King
Dayton Industrial Drum, Inc.
73. Larry King
1519 Leo Street
Dayton, OH 45404
Dayton Industrial Drum, Inc.
74. Joseph P. Kwan
Corporate Director, Environmental Remediation
Northrop Grumman Corporation
Please contact through Gabe Calvo, Northrop Grumman
Corporation Law Department, 2980 Fairview Park Drive, Falls
Church, VA 22042-4511, 703-280-4092.
Kelsey-Hayes Company.
75. Melvin Layer
The Dayton Power and Light Company.
76. Glenn Leis
6105 Springboro Road
Lebanon, OH 45036
(937) 748-1097
See deposition.
77. James Leiter
Former Sanitarian, Montgomery County Health District
May have knowledge of inspections and compliance monitoring of
the Site, operations, types of waste disposed of, identity of
generators and transporters of waste to the Site, and methods of
disposal at the Site.

78. Charles Lewis
Former Sanitarian Inspector, Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of
the Site, operations, types of waste disposed of, identity of
generators and transporters of waste to the Site, and methods of
disposal at the Site.
79. Michael Manzo
See deposition.
80. Cathy McCoy
The Peerless Transportation Company.
81. Jim T. McDonald
117 Trumpet Drive
Dayton, OH 45449
(937) 866-7554
See deposition.
82. Hershell Todd Million
Dayton Industrial Drum Inc.
83. Robert Michigan
3127 E. Stroop Road
Kettering, OH 45440
Cox Media Group Ohio, Inc., *as successor to* Dayton Daily News
and to Dayton Journal Herald.
84. James Minor
DAP Products Inc. *as successor to* DAP, Inc.; La Mirada Products
Co., Inc., *formerly known as* DAP, Inc.
85. Frank Miracle
Bridgestone Americas Tire Operations, LLC, *as successor to* The
Dayton Tire & Rubber Company; Bridgestone/Firestone, Inc. *f/k/a*
The Dayton Tire & Rubber Company.
Deceased; see deposition in prior matter, to be produced.
86. Joe Moore
31 Apple Hill
Springfield, OH 45504
937-825-9126
Former employee of Ohio EPA, DSHWM, SWDO.
May have knowledge of inspections and compliance monitoring of
the Site, operations, types of waste disposed of, identity of

generators and transporters of waste to the Site, and methods of disposal at the Site.

87. George Morris Jr.
See deposition.
88. James Morris
US EPA, Region 5.
77 West Jackson Blvd
Chicago, IL 60604
312-886-6632
Consistency with NCP; cooperation by the parties with Federal, State, or local officials to prevent any harm to the public health or the environment.
89. James Morris
Harris Corporation, *as successor to* Harris-Seybold Co.
90. Thomas Nash
Former employee of US EPA.
Consistency with NCP; cooperation by the parties with Federal, State, or local officials to prevent any harm to the public health or the environment.
91. Gale O'Brien
Former Sanitarian, Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of the Site in the late 1960s through the 1970s, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site during that time period.
92. Bill Osman
Dayton Industrial Drum, Inc.
93. Dean Ottoson
5670 Signet Drive
Dayton, OH 45424
937-522-0696
937-237-1308
Former operator of Ottoson Solvents on the northern portion of the Site now owned by Valley Asphalt.
May have knowledge of operations, customers, transporters to the Site, and hazardous substances disposed of at the Site, including burial of still bottoms at the Site.

94. Leslie Patterson
US EPA, Region 5.
77 West Jackson Blvd
Chicago, IL 60604
312-886-4904
Consistency with NCP; cooperation by the parties with Federal, State, or local officials to prevent any harm to the public health or the environment; connection of releases to response costs.
95. Marshall (Bill) Patterson
The Sherwin-Williams Company.
96. Joseph Pizzino
7001 Hardwicke Place
Dayton, OH 45414
937-890-2319
See deposition.
97. Charlotte Quigley
Kimberly-Clark Corporation.
98. Michael Quigley
2936 Hillcrest Circle S
Clearwater, FL 33759-1210
(727) 796-4229
Waste Management of Ohio, Inc., *as successor to* Industrial Waste Disposal Co. Inc., and to Blaylock Trucking and Waste Removal, and to SCA Services of Ohio, Inc., and to Container Services, Inc. *a/k/a* Container Service, Inc., and to General Refuse Service, Inc., and to Container Service Co., and to General Sanitation Corporation.
99. Stephen Quigley
GHD
651 Colby Drive
Waterloo, Ontario N2V 1C2
519-884-0510
Work performed in VI and RI/FS; consistency with NCP; releases at Site; connection between releases and incurrence of response costs.
100. Kathy Rabbit
Monsanto Company, *a/k/a* Monsanto Research Company, *n/k/a* Pharmacia Corporation.
101. Ernest Rader

Harris Corporation, *as successor to Harris-Seybold Co.*

102. Larry Rankin
343 Red Oak Drive
Fairborn, Ohio 45324
(937) 879-0836
See deposition.
103. Earl Reeder Jr.
Coca-Cola Refreshments USA, Inc., *as successor to Dayton Coca-Cola Bottling Co.*
104. Robert Reis
Harris Corporation, *as successor to Harris-Seybold Co.*
105. Steven Renninger
US EPA, Region 5
25063 Center Ridge Road
WestLake, OH 44145
513-569-7539
Consistency with NCP; cooperation by the parties with Federal, State, or local officials to prevent any harm to the public health or the environment; connection of releases to response costs.
106. Frederick Rice
Harris Corporation, *as successor to Harris-Seybold Co.*
107. Thomas Richie Jr.
The City of Dayton, Ohio
108. Robert Saltsgaver
1095 Holbrook Road
Beaver, OH 45613
740-820-5283
Bridgestone Americas Tire Operations, LLC, as successor to The Dayton Tire & Rubber Company; Bridgestone/Firestone, Inc. f/k/a The Dayton Tire & Rubber Company.
109. G.L. Scandrick
4004 Calhoun Street
Dayton, Ohio 45417
(937) 268-4961
See deposition.
110. Robert Scarborough

The Dayton-Power and Light Company.

111. Robert Seilheimer
DAP Products Inc. *as successor to* DAP, Inc.; La Mirada Products Co., Inc., *formerly known as* DAP, Inc.
112. David Shellhaas
4822 W. Shearer Road
West Milton, OH 45383
937-698-5303
The Dayton Power and Light.
113. Joseph Smart
5240 Tilbury Road
Huber Heights, Ohio
See deposition.
114. John Smelko
318 Enxing Street
West Carrollton, OH 45449
937-554-9565
Kimberly-Clark Corporation.
115. Jim South
5665 Mayville Drive
Dayton, Ohio 45432
See deposition.
116. Thomas Spence
679 High Point Drive
Springboro, OH 45066
937-885-5043
See deposition.
117. John Stitt
Waste Management of Ohio, Inc., as successor to Industrial Waste Disposal Co. Inc., and to Blaylock Trucking and Waste Removal, and to SCA Services of Ohio, Inc., and to Container Services, Inc. a/k/a Container Service, Inc., and to General Refuse Service, Inc., and to Container Service Co., and to General Sanitation Corporation.
118. Frederick Stovall
The City of Dayton, Ohio.
119. Robert Stringer

Flowserve Corporation as successor to Duriron Corporation.

120. Denny Sweet
The City of Dayton, Ohio.
121. Earl Tarr
9087 Stillwater Drive
Bradford, OH 45308
937-448-0812
Former employee of Ottoson Solvents on the northern portion of the Site now owned by Valley Asphalt
May have knowledge of operations, customers, transporters to the Site, and hazardous substances disposed of at the Site, including burial of still bottoms at the Site.
122. Jim Tharpe
3276 Ferry Rd.
Bellbrook, Ohio 45305-9739
(937) 848-4482
See depositions.
123. Jerry Tompkins
Former employee of Monsanto Company; may have knowledge of the historic activities of Defendant which have resulted in the discharge, release, or disposal, of hazardous substances, contaminates, or pollutants at or adjacent to the Site.
124. Dunny Toy
33 Knights Crest Court
Souderton, PA 18964
(215) 723-6113
Monsanto Company, a/k/a Monsanto Research Company, n/k/a Pharmacia Corporation.
125. Vernon Vencill
3115 Myers Tillman Road
Arcanum, OH 45304
(937) 417-2708
See deposition.
126. Clarence Wall
394 Marshall Drive
Xenia, Ohio 45385
See deposition.
127. John L. Wantz

410 Carlwood Drive
Miamisburg, OH 45342
(937) 866-6436
Kelsey-Hayes Company.

128. Michael Wendling
260 Corkill Lane
Franklin, North Carolina 28734
(937) 520-7730
See depositions.
129. Wayne Wertz
9085 Milton Potsdam Road
West Milton, OH 45383
Former employee of Industrial Waste Disposal Co., Inc.
May have knowledge of operations, customers, transporters to the Site; and hazardous substances disposed of at the Site.
130. Wayne Wheeler
Coca-Cola Refreshments USA, Inc., as successor to Dayton Coca-Cola Bottling Co.
131. Alan Williams
Former Sanitarian, Montgomery County Health District
May have knowledge of inspections and compliance monitoring of the Site, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site.
132. James Witham
Kimberly-Clack Corporation
133. Leslie Woods
Monsanto Company, *a/k/a* Monsanto Research Company, *n/k/a* Pharmacia Corporation.
134. Herman Woodum
Bridgestone Americas Tire Operations, LLC, as successor to The Dayton Tire & Rubber Company; Bridgestone/Firestone, Inc. *f/k/a* The Dayton Tire & Rubber Company.
135. Alan Wurstner
343 Telford Avenue
Dayton, Ohio 45419
(937) 298-7995
See deposition.

- 136. Cecil Younker
2604 E. 4th Street
Dayton, Ohio 45403
(937) 253-4891
See deposition.
- 137. Unknown corporate representatives of each Defendant.
- 138. All persons necessary to identify and authenticate any exhibits in this case.
- 139. All persons identified in Plaintiffs' or any Defendant's initial disclosures, discovery responses, or lay witness lists.
- 140. All witnesses necessary for rebuttal or impeachment.
- 141. Plaintiffs reserve the right to move to amend their lay witness list in accordance with the Omnibus Scheduling Order.

Respectfully submitted,

/s/ James A. Dyer

James A. Dyer, Esq. – Trial Attorney

(Ohio Reg. No. 0006824)

Email: jdyer@ssdlaw.com

Scott Davies, Esq. – Trial Attorney

(Ohio Reg. No. 0077080)

Email: sdavies@ssdlaw.com

SEBALY SHILLITO + DYER LLP

1900 Kettering Tower

40 North Main Street

Dayton, Ohio 45423-1013

(937) 222-2500

Plaintiffs' Trial Attorneys

Larry Silver

David E. Romine

Jennifer G. Meyer

LANGSAM STEVENS SILVER &

HOLLAENDER LLP

1818 Market Street, Suite 3400

Philadelphia, PA 19103

Phone: (215) 723-3255

Fax: (215) 732-3260

Email: lsilver@lssh-law.com

dromine@lssh-law.com

jmeyer@lssh-law.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing document was filed and served upon all counsel of record via email on November 1, 2016.

/s/ Jennifer Graham Meyer
Jennifer Graham Meyer